

## **Statement in Support of Effective Limits on Offsets for Reducing Global Warming Pollution**

The AB 32 Scoping Plan proposes using a multi-sector greenhouse gas cap and trade system as one of many tools for reducing greenhouse gas emissions in California. The cap and trade program that has been proposed includes an unacceptably high amount of compliance offsets that could be used to substitute for direct emission reductions in capped sectors.

The proposed limit is 49 percent of the total emission reductions expected in the capped sectors below the 2012 cap—which amounts to well over 100 percent of the emission reductions expected to be achieved through California’s cap and trade program.

**CARB should remove all references to specific offsets levels in the Scoping Plan and state that these decisions will be discussed and finalized during the rulemaking process. CARB should state in the Scoping Plan that, if it decides to use compliance offsets at all, it will set quantitative offset limits well below those proposed by the Western Climate Initiative. CARB should state in the Scoping Plan that if offsets are used, offsets that maximize environmental and economic co-benefits to California will be given the highest priority.**

We urge ARB not to rely on offsets as a means of meeting AB32 targets. Offsets, if used at all, should be limited to no more than a small fraction of the emission reductions expected from a cap and trade program. The State should focus on solutions that spur innovation and lead to the deployment of new technologies that create high quality jobs, boost industries, and protect communities with the most significant exposure to air pollution.

Compliance offsets erode the ability of AB32 to maximize crucial environmental and economic and public health benefits in California. If allowed under the plan to implement AB32, they would diminish the impetus to develop innovative approaches and technological solutions that achieve permanent emissions reductions and eliminate jobs that would otherwise be created through the modernization of industrial facilities.

Offsets would also jeopardize the interests of Environmental Justice communities in California, as offsets projects are unlikely to be developed near the source of emissions or provide benefits to affected communities.

### **Benefits of Limiting Offsets:**

**Maximizing economic and green job co-benefits** of climate action in California. Limiting offsets helps direct the flow of capital to green energy and other clean tech global warming solutions in California’s high-emitting sectors. Not only will California benefit from this increased investment in green technology for the state’s highest-emitting sectors like electricity and transportation, but the entire world can also benefit as this clean technology is exported. Limiting offsets can thus help enable California businesses to capture a larger share of the rapidly growing global market for clean technologies and create green jobs here in California.

Recent economic models from the University of California at Berkeley suggest that allowing unlimited offsets in a California cap-and-trade program would have an economic cost because they would delay productive investments in more efficient state-based technologies that could save consumers and businesses money and help create new jobs. The analysis also suggests that a cap-and-trade program that prohibits or limits the use of offsets *increases* economic growth in the state as compared with a program that allows unlimited offsets. Plus, investments in clean energy and clean transportation have the advantage of putting California further along the path toward reaching its 2050 climate goal of 80% reductions from 1990 levels.

**Maximizing clean air-co-benefits** of climate action in California. If electricity providers, oil and gas companies, and automakers are required to directly reduce the global warming pollution they produce, Californians will reap the benefits of related decreases in conventional smog-forming and toxic air pollutants. Improved air quality will in turn lead to improved public health, lower health care costs, and improved worker productivity and student performance.

If California's global warming emitters are allowed to keep polluting and simply buy credits for emissions reductions happening elsewhere in the world—in effect outsourcing their reductions—Californians will lose out on local air quality and other co-benefits, including the improved energy security that will follow from less reliance on imported oil and gas.

<b>Name</b>	<b>Organization</b>
Peter Barnes	Tomales Bay Institute
Bernadette de Chiaro	Environment California
Carla Din	California Apollo Alliance
Kristin Grenfell	NRDC
Ann Hancock	Climate Protection Campaign
Bonnie Holmes-Gen	American Lung Association of California
Tam Hunt	Community Environmental Council
Andy Katz	Breathe California
Denny Larson	Global Community Monitor, National Refinery Reform Campaign & National Bucket Brigade Coalition
Bill Magavern	Sierra Club California
Patrick McCully	International Rivers
Rachel McMahan	CEERT
Rachel Morris	VCCool
Brian Nowicki	Center for Biological Diversity
Shankar Prasad	Coalition for Clean Air
Erin Rogers	Union of Concerned Scientists
Barbara Haya	Energy and Resources, UC Berkeley
David Roland-Holst	Agricultural and Resource Economics, UC Berkeley*
Michael Wara	UCS Technical Board Member Stanford Law School*

*\*Listed for affiliation purposes only.*

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